


Approved by:


JULIA MCCORMICK
Special Assistant United States Attorney



Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

19 MAG 9721

-----x
UNITED STATES OF AMERICA : MISDEMEANOR
: COMPLAINT
:
:
-v- : Violation of
: 18 U.S.C. 113(a) (4)
JESSICA L. SCHOCK :
DEFENDANT :
: COUNTY OF OFFENSE:
: SULLIVAN
:
-----x

SOUTHERN DISTRICT OF NEW YORK, ss:

SEAN MCNEIL, being duly sworn, deposes and says that he is a Police Officer, assigned to the Department Interior, National Park Service, Upper Delaware Scenic & Recreational River, Beach Lake, Pennsylvania, which is includes the Southern District of New York, and charges as follows:

COUNT ONE

On or about July 4, 2019, at Jerry's Three River Campground, Pond Eddy, New York, within the special maritime and territorial jurisdiction of the United States, in the Southern District of New York, JESSICA L. SCHOCK, the defendant, unlawfully, knowingly and willfully assaulted another by striking, beating, or wounding such person, to wit, the defendant hit the victim with a round house punch connecting with the right side of the victim's head.

(Title 18, United States Code, Section 113(a) (4))

The bases for the deponent's knowledge and for the

foregoing charges are, in part, as follows:

1. I am a Park Ranger, assigned to the Department of Interior, National Park Services, Upper Delaware Scenic & Recreational River, Beach Lake, Pennsylvania, which includes parts in the Southern District of New York.
2. On or about July 4, 2019 at approximately 3:36 p.m., from the shoreline at Corwin Farm Ranger Station, Ranger Reish observed a Jerry's Three Rivers Campground raft with two female occupants and a juvenile on board and two males swimming and snorkeling and hanging onto the raft approximately 50 yards from the Ranger.
3. The female on the raft, later identified as the defendant, was drinking from a Michelob Ultra 12 oz can. She then proceeded to toss a can to one of the males in the water who then swam toward the Pennsylvania shoreline. The individual got out sat on the shoreline and drank the beer. When he finished he set the can on the rocks and reentered the water and swam away leaving the can on the rocks.
4. Ranger Reish then walked out onto the Corwin boat launch where six members of the National Canoe Safety Patrol (NCSP) were taking their patrol boats off the water. Ranger Reish called out to the raft and identified himself as a federal law enforcement officer and ordered the group to paddle to his location. The defendant stated, "we're not paddling over there." Ranger Reish again ordered the group to paddle to shore when the defendant stated, "fuck you, if you want to talk to us meet us at Jerrys." Ranger Reish for a third time identified himself and ordered them to shore.
5. The group ignored Ranger Reish's order and continued to drift downstream and made no attempt to come to shore. Ranger Reish called for Rangers McNeil and Cyr to assist with a group that was being uncooperative. Members of the NCSP overheard most of the conversation between Ranger Reish and the group and NCSP member, Gene Berliner provided a written statement regarding the incident.
6. One of the males, father of the defendant, Conrad Schock, acknowledge Ranger Reish order and swam up to his location. Ranger Reish explained to Conrad what he had observed and that he needed to discuss the littering violation. Conrad called out to the raft and told them to come to shore and the defendant said no refusing her father's request.

7. Rangers McNeil and Cyr arrived on scene to assist. Ranger McNeil retrieved Ranger Reish marked patrol vehicle and moved it to the boat ramp. Using the PA system, Ranger McNeil ordered the raft to their location. The defendant again yelled no and that they would have to meet them at Jerrys. The defendant and the other male began paddling the raft down river leaving Conrad behind.

8. At approximately, 4:23 p.m., Ranger McNeil took Conrad in the back of his vehicle to Jerrys Three River Campground, approximately 2 miles from the Corwin Farms Ranger Station. At approximately 5:23 p.m., the raft arrived at Jerrys. Ranger Reisch ordered them to leave their gear in the raft and ordered them to a near by picnic table. The other female in the raft was identified as Conrad's wife and she offered to stay with the juvenile with the raft.

9. The defendant became irate using profanities, stating, "this is bull shit." Ranger Reish observed her grab and put on a pair of shoes. She was ordered again to go up the bank and sit at the table. The defendant ignored the order and continued to gather her belongings from the raft. She was ordered again to the picnic table which she ignored. After several more commands, the defendant stated, "I'm not going over there. I'm not listening to you."

10. After the defendant's continued refusal to obey orders, Ranger Reish applied an escort hold in an attempt to direct her toward the picnic table. The defendant jerked her arm and yelled, "get your hands off me. I'm not going with you." Ranger Reish still had an escort hold on her and ordered her to stop resisting and head to the picnic table. The defendant was forcefully yanking her left arm and came around with a round house punch with her right arm, striking Ranger Reish hard on the right side of his head near his temple. Ranger Reish was stunned for a moment but was able to maintain his hold on her wrist. Ranger McNeil came to assist in getting the defendant under control. The defendant was taken to the ground and Ranger McNeil was attempting to get her handcuff.


11. The defendant's brother, Zachary, the other male who had been on the raft, was advancing towards the Rangers. Conrad and his wife were also advancing towards the Rangers. Zachary started yelling, "that's my sister." Ranger Reish disengaged from the defendant and pulled his Taser and turned it on and ordered Zachary to stop and back up. Zachary stopped temporarily when he saw the Taser. He stated, "what are you going to do, Tase me?" Zachary was in a fighting stance with his hands fisted. He was ordered by Ranger Reish several more times to back up. He refused

stating that is my sister. Ranger McNeil was still actively trying to secure the defendant, when Zachary advanced toward them. Ranger Reish shouted, "Taser, Taser" and deployed his taser. He continued to give Zachary orders to stop resisting, roll over on his stomach and put his hands behind his back. Zachary shouted, "You tased me." Zachary was ordered to roll over and put his hands behind his back. Zachary failed to comply and Ranger Reish cycled his taser again. Zachary complied this time and rolled over and put his hands behind his back. Ranger Reish holstered his taser with the leads attached and secured Zachary in handcuffs. Ranger McNeil was able to secure the defendant and both individuals were moved to the picnic table.

12. When the defendant was asked for her name, she stated it was Tiffany but the mother who was standing near by told the defendant to stop lying and informed Ranger Reish that her name was Jessica not Tiffany. Both the defendant was uncooperative during the whole process and were eventually transported to DEWA for processing. Ranger Reish spoke with AUSA Phillip Caraballo from the middle district of Pennsylvania US attorney's office. He said to charge them and ROR them. He also said since the assault occurred in New York to charge the assault in the southern district of New York.


13. Defendant was issued one United States District Court Violation Notice for Assault on Federal Officer (DCVN Number 9213254/SY23) and was released on her own recognizance.

WHEREFORE, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.



SEAN MCNEIL
National Park Service

Sworn to before me this
18th day of October 2019



HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York